

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No.: 4:24-CV-10017-JEM

AKARI JOHNSON and
HAZEL THOMPSON

Plaintiffs,

v.

MMI 82, LLC,
And THE ENTHUSIAST LLC,

Defendants.

**DEFENDANTS' UNOPPOSED MOTION FOR AN
EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' COMPLAINT**

Defendants, MMI 82, LLC and THE ENTHUSIAST LLC (collectively referred to as “Defendants”), by and through undersigned counsel, pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, hereby file their Unopposed Motion for Extension of Time to Respond to Plaintiff’s Complaint [D.E No. 1]. Defendants request that their responses are due through and including April 22 for both Defendants and further states:

1. On or about February 22, 2024, Plaintiffs, AKARI JOHNSON and HAZEL THOMPSON, filed a Complaint against MMI 82, LLC and THE ENTHUSIAST LLC, pursuant to 42 U.S.C. § 1981 and 29 U.S.C. § 201.
2. On or about February 28, 2024, THE ENTHUSIAST LLC was served with process and was required to respond to the Complaint by March 20, 2024.
3. On or about March 12, 2024, MMI 82, LLC was served with process and was required to respond to the Complaint by April 2, 2024.

4. The Defendants recently retained counsel to represent them in this matter, and Defendants' Counsel immediately reached out to the Plaintiff's counsel to request an extension of time to respond to the Complaint through and including April 22, 2024

5. On April 1, 2024, Plaintiff's counsel, Daniel J. Barroukh, communicated via email that he was agreeable to an extension of time for both Defendants to respond to the Complaint through and including April 22, 2024.

6. This is the first time such an extension has been requested and it is not for the purpose of delay.

7. As this matter is in its initial stages, no party will be prejudiced by the Court granting the relief sought.

WHEREFORE, Defendants, MMI 82, LLC, and THE ENTHUSIAST LLC request that this Honorable Court enter an Order granting the extension for Defendants to respond to Plaintiffs' Complaint, through and including April 22, 2024.

CERTIFICATION OF CONFERRAL UNDER LOCAL RULE 7.1 (A)(3)

Pursuant to Local Rule 7.1(a)(3), I hereby certify that On March 29, 2024, Counsel for the Defendants conferred with Plaintiff's counsel and asked for an extension of time through and including April 22, 2024, to prepare a response to the Complaint on behalf of both Defendants. On April 1, 2024, Plaintiff's Counsel agreed to an extension through and including April 22, 2024, for both Defendants.

CERTIFICATE OF SERVICE

I hereby certify a true and correct copy of the foregoing Motion for Extension of Time was filed on all parties of record via the CM/ECF system on this 2nd day of April 2024.

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